



CES Environmental Services, Inc. Site Proposed Removal Action

Harris County
Houston, Texas

November 2014

This Fact Sheet will tell you about...

- Background Information
- Potential Threats to Public Health and Welfare
- Response Action Update
- What to Expect
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Background Information

The CES Environmental Services Site (Site) is a former chemical recycling facility that is located at 4904 Griggs Road, Houston, Harris County, Texas. Other contiguous properties associated with the Site are 4900 Griggs Road and 5910 Wayland Street. The Site is surrounded by residential, educational, and commercial properties.

CES Environmental Services filed for bankruptcy in 2010. The property is part of the CES Bankruptcy Estate, which is being managed by a Trustee appointed by the Bankruptcy Court. The Trustee's job is to liquidate assets of the Estate for the benefit of the creditors.

There are numerous chemical containers located on site and consist of approximately 11 vacuum boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 22 above ground storage tanks (ASTs), 19 wastewater treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. These containers contain materials including acids, corrosives, flammables, and specific hazardous wastes including benzene, cresol (phenols), lead, and chromium. These containers have not been actively managed since August 2010 when the facility filed for bankruptcy protection and are therefore not in shippable condition.

There were two known significant spill incidents that occurred in 2014 (March and July). The March incident was the result of the theft of on-site equipment including 2 tanker trailers and 7 roll-off boxes. The materials were dumped to the ground or into on-site containment structures and the equipment stolen. The July incident is believed to be the result of an intentional opening of a valve which drained oil and oily water from a tanker trailer used for oil-water separation. This material spilled onto the ground within the facility and was pushed by rainfall and off-site drainage into the residential area south of the facility along

Kingsbury. The following entities were involved in the various spill responses: CES Estate, City of Houston, Texas Commission on Environmental Quality (TCEQ) and EPA.

Although lacking adequate funding, the Trustee has been and continues to address waste issues at the Site in coordination with TCEQ and EPA. EPA and TCEQ are addressing the bulk of the waste issues on the property and have been since September 2014.

Potential Threats to Public Health and Welfare

The major threat to public health and welfare are the numerous chemical containers located on the Site. Additionally, the chemical odors emanating from the Site are associated with cresol/phenolic compounds located within compromised chemical containers, along with historic spillage. The odors and this threat will continue until all waste materials have been removed from the Site and properly disposed.

The regulatory agencies recognize that chemical spills have occurred on the Site and have likely caused both on and off-site contamination. These environmental media will require further investigation to determine the extent of such contamination. The first step in this process is the conduct of a Preliminary Assessment which has been initiated by TCEQ.

Response Action Update

EPA, TCEQ, and the City of Houston continue to work closely to address the Site issues.

EPA began response actions on the Site in late August 2014. The initial steps included sampling the on-site containers to determine chemical composition and possible disposal options. To date, EPA has sampled and/or received analytical results on almost all of the larger containers (vacuum boxes, frac tanks, ASTs, and wastewater treatment tanks).

As of November 21, 2014, EPA has completed the following:

- Vacuum/Roll-Off Boxes: 7 of 11 have been transferred and/or disposed. 2 of 11 were disposed of by the Trustee.
- Frac Tanks: 3 of 11 have been disposed
- ASTs: 3 of 22 have been disposed. Chemicals have been removed from 3 AST secondary containments.
- Tanker Trailers: 2 of 2 have been disposed.
- Storm water is being managed to reduce off-site drainage.
- Lab Chemicals have been consolidated and disposed (Trustee).
- Old chemical products have been disposed out of Wayland Warehouse (Trustee).
- Debris from stolen roll-offs was removed from the ground and disposed (Trustee).

Continued Actions will include:

The completion of the Vacuum Boxes, Frac Tanks, ASTs, Wastewater Treatment Tanks, Totes, Vats, Drums and Miscellaneous Containers, Visually Contaminated Asphalt/Concrete, Soil and Debris.

In order to attempt to manage on-site contaminated storm water, EPA and the City of Houston have worked out an agreement to allow EPA to actively discharge to the City of Houston sanitary sewer rather than the storm water running off-site into the storm drains untreated at the corner of Wayland/Griggs. This action will not completely eliminate runoff from the facility during heavy rain events but will reduce the volume that would normally run off site untreated.

The City of Houston is also providing potable water to EPA for use in cleaning activities on the Site.

Since starting this response action in late August 2014, EPA has experienced two theft/vandalism events. The first event was the theft of batteries from a piece of equipment and the second was the vandalism of project fence blocking Wayland Street. These types of events slow progress. EPA requests that you continue to be vigilant and report suspicious activity by contacting the Houston Police Department.

What to Expect During the Next Month and Beyond

EPA expects to complete the disposal of all of the materials from the vacuum boxes, and make substantial progress on the frac tanks and ASTs. Additionally, EPA anticipates dewatering the pooled areas, pending rainfall, and remov-

ing what is believed to be contaminated sediment. Additional sampling of containers is anticipated as appropriate detection limits could not be met due to matrix interferences.

Please keep in mind that waste can only be shipped off site for disposal once a disposal facility has agreed to accept the waste and scheduled it for pickup.

Also, the scope of the current action being taken by EPA consists of the following:

- Removal/disposal of chemicals on the facility.
- Removing/disposing of visible chemical spillage to soil and other surfaces on the facility.

For More Information

If you would like more information about the CES Environmental Services Removal Action, contact:

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